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IN THE

Supreme Court of the United States

October Term, 1979
No. 79-1348

WORLDWIDE CHURCH OF GOD, INC., ET AL.,
PETITIONERS,

vs.

STATE OF CALIFORNIA, ET AL.,
RESPONDENTS.

On Petition for a Writ of Certiorari to the Court of Appeal of the State of California, Second Appellate District, Division Three

Motion for Leave to File Brief Amici Curiae and Brief of

HOLY SPIRIT ASSOCIATION FOR THE UNIFICATION OF WORLD CHRISTIANITY

ALLIANCE FOR THE PRESERVATION OF RELIGIOUS LIBERTY

As Amici Curiae in Support of Granting Certiorari.

BARRY FISHER,
2049 Century Park East, Suite 3160,
Los Angeles, Calif. 90067,
(213) 557-1077,

FLOYD MORROW,
454 Mission Valley Center West,
San Diego, Calif. 92108,
(714) 297-4994,
Attorneys for Amici Curiae.

Parker & Son, Inc., Law Printers, Los Angeles. Phone 724-6622

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The following organizations, pursuant to Rule 42 of this Court, respectfully move for leave to file a brief, amici curiae, in support of granting a writ of certiorari:

1. The Holy Spirit Association for the Unification of World Christianity which is a revelatory Christian church headquartered in New York, New York. It has 10,000 members nationwide and operates centers for study and fellowship in every state.

2. The Alliance for the Preservation of Religious Liberty which is a California non-profit corporation, having its headquarters in San Diego, California. It is a national organization, with some 20 chapters in 16 states, and is devoted to involvement in selected legal actions designed to ensure that the constitutional rights of individuals and religious organizations are upheld and preserved.

Permission to File This Brief, Amici Curiae, Was Requested From the Parties in This Matter but Was Refused.

Leave to file the accompanying amici curiae brief was requested of the parties to this matter. Such permission was received from petitioners, but refused by respondent, State of California.

The Moving Parties, as Disinterested Organizations Active in Religious Affairs and Devoted to the Maintenance of Constitutional and Religious Freedoms, Are Uniquely Qualified to Advise the Court Concerning the Nature and Importance of the Issues Tendered by the Petition.

The experience and situations of the moving parties, one an active and dynamic national church organization, the other a national organization specifically formed for the purpose of enhancing and defending religious freedom, add depth and further dimension to the already impressive group of amici curiae whose brief is referred to in the accompanying proposed brief of these moving parties.

These moving parties are dedicated to the ideals of religious freedom expressed in our federal Constitution, and the issues tendered by the subject case bear

directly upon their very reasons for being. On the other hand, both are completely detached from the litigation itself as well as from the parties and the activities which are the subject of the litigation. Neither of these moving parties has any interest in protecting fraudulent behavior perpetrated under a religious mask. They both believe that all religious institutions should merit the respect and devotion of their adherents and supporters. However, the legal theories advanced by respondent, State of California, and its activities in furtherance of those claims, as manifested in the subject case, present, in the view of these amici curiae, a threat to all churches and religious organizations, a threat which, in their view, they are uniquely qualified to interpret and articulate to this Court.

For these reasons, these moving parties urge that the Court accept their accompanying brief for filing along with the brief of the other amici curiae, in a joint and unified appeal to this Court to grant the petition for writ of certiorari of petitioners, Worldwide Church of God et al.

Respectfully submitted,

BARRY FISHER,
FLOYD MORROW,
Attorneys for Amici Curiae.

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The Holy Spirit Association for the Unification of World Christianity and the Alliance for the Preservation of Religious Liberty concur fully in the amici curiae brief in support of granting certiorari prepared by the American Civil Liberties Union of Southern California, Americans United for Separation of Church and State Fund, Inc., the Institute for the Study of American Religion, the Berkeley Area Interfaith Council, the Christian Legal Society, the Methodist Federation Fund and the Committee to

Defend the First Amendment Research Institute. Rather than repeat the statements and arguments contained therein, these amici refer to and adopt said brief as their own and urge to the Court, for the reasons and upon the grounds therein stated, that the Court grant the petition and issue a writ of certiorari as prayed in order that the grave issues tendered thereby, which bear directly and menacingly upon the religious freedom of all Americans, may be considered and dealt with by the Court.

Respectfully submitted,

BARRY FISHER,
FLOYD MORROW,
Attorneys for Amici Curiae.